

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

s.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

**DEFENDANT'S
UNOPPOSED MOTION TO
EXCEED WORD LIMIT**

Defendant Board of Regents of the University of Nebraska ("BRUN"), pursuant to NECivR 7.1(d)(2), and hereby moves the Court for an Order allowing them to exceed the limits of 13,000 words for their Brief in support of Motion for Summary Judgment. In support, Defendant states:

1. In this case, there are two Plaintiffs, each with a Title IX, deliberate indifference claim, remaining.

2. Each of the Plaintiffs presents their own distinct and unique facts.

3. During the course of discovery, the parties exchanged approximately 12,000 pages of documents and multiple audio recordings with hours of transcribed content.

4. Defendant's Motion for Summary Judgment asks this Court to dismiss all of the remaining claims with prejudice.

5. Defendant is preparing one Brief in Support of the Motion for Summary Judgment addressing both Plaintiffs' claims.

6. Defendant requires the additional word count in order to address all material facts as it relates to the allegations of these two Plaintiffs.

7. Furthermore, in its Brief, Defendant plans to address the damages requested in the Second Amended Complaint.

8. Defendant's counsel contacted counsel for Plaintiffs on August 30, 2024. Plaintiffs' counsel does not object to this motion.

9. Accordingly, Defendant respectfully requests leave to file a Brief in excess of the 13,000 word limit, not to exceed 16,000 words.

WHEREFORE, Defendant respectfully requests that the Court grant its Motion to Exceed Word Limit, not to exceed 16,000 words.

DATED this 30th day of August, 2024.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA, Defendant

By: /s/ Lily Amare
Susan K. Sapp #19121
Lily Amare #25735
Cline Williams Wright
Johnson & Oldfather, L.L.P.
1900 U.S. Bank Building
233 South 13th Street
Lincoln, NE 68508
(402) 474-6900
ssapp@clnewilliams.com
lamare@clnewilliams.com

AND

Bren H. Chambers, #23150
Deputy General Counsel
University of Nebraska
3835 Holdrege Street
Lincoln, NE 68583-0745
(402) 472-1201
bchambers@nebraska.edu

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.

/s/ Lily Amare
Lily Amare